

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:	:	CHAPTER 7
	:	
LUIS NELSON ACEVEDO,	:	CASE NO. 5:23-bk-00462-MJC
	:	
DEBTOR	:	

**MOTION OF THE UNITED STATES TRUSTEE FOR EXTENSION OF TIME  
TO FILE MOTION TO DISMISS PURSUANT TO 11 U.S.C. § 707 AND/OR TO  
OBJECT TO DISCHARGE PURSUANT TO 11 U.S.C. § 727 WITH CONCURRENCE**

NOW COMES the United States Trustee, through undersigned counsel, and respectfully moves this Court to enter an Order extending the time to file a motion to dismiss pursuant to 11 U.S.C. § 707 and/or to file a complaint objecting to discharge pursuant to 11 U.S.C. § 727 and, in support thereof, states the following:

1. On March 5, 2023, the Debtor filed a voluntary petition for relief under Chapter 7 of the Bankruptcy Code. *Docket No. 1.*
2. On May 25, 2023, Assistant United States Attorney Suzanne P. Conaboy, acting on behalf of the Social Security Administration, filed a motion to extend the deadline for filing a complaint objecting to discharge in the Debtor's case through and including July 3, 2023. *See Docket No. 17.*
3. Counsel for the United States Trustee requires additional time to contact and confer with AUSA Conaboy to ascertain any concern that the Social Security Administration may have with the Debtor's case that may require the involvement of the United States Trustee.
4. Bankruptcy Rule 1017 states that a motion to dismiss under 11 U.S.C. § 707 must be filed within 60 days following the first date set for the meeting of creditors held pursuant to 11 U.S.C. § 341 unless, before such time has expired, the court for cause extends the time for filing the motion. In this case, the last day to file such a motion is June 2, 2023.

5. Bankruptcy Rule 4004 states that an objection to discharge under 11 U.S.C. § 727 must be filed within 60 days following the first date set for the meeting of creditors held pursuant to 11 U.S.C. § 341. The Rule also provides that a court may extend the time for filing a complaint for cause after hearing on notice. In this case, the last day to file a complaint is June 2, 2023.

6. The United States Trustee wishes to extend the applicable deadlines to file a motion to dismiss pursuant to 11 U.S.C. § 707 and/or to file a complaint objecting to discharge pursuant to 11 U.S.C. § 727 to preserve the United States Trustee's rights pending its receipt of any relevant information concerning the Debtor's case from AUSA Conaboy and/or the Social Security Administration.

7. The United States Trustee believes that cause exists to extend the time for filing a motion to dismiss and/or for filing a complaint objecting to discharge and seeks an extension of time to do so for approximately thirty (30) days through and including July 3, 2023.

8. The Debtor's counsel consents to the relief sought herein.

WHEREFORE, the United States Trustee respectfully requests that the Court enter an Order extending the time for the United States Trustee to file a motion to dismiss pursuant to 11 U.S.C. § 707 and/or to file a complaint objecting to discharge pursuant to 11 U.S.C. § 727 through and including July 3, 2023 and grant such other and further relief as is just and equitable.

Respectfully submitted,

ANDREW R. VARA  
UNITED STATES TRUSTEE  
REGIONS 3 AND 9

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